

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street SW Suite TW-325 Washington, DC 20554

RE: WC Docket No. 10-90 - Connect America Fund - Expression of Interest for Rate-of-Return Rural Broadband Experiment

Dear Ms. Dortch:

XIT Telecommunication & Technology, Ltd. (XTT) hereby submits this non-binding expression of interest to conduct a rural broadband experiment in one of its six exchanges - the exchange of Hartley.

Background

XTT is a competitive local exchange carrier in the state of Texas that provides local exchange service, long distance, high-speed internet with speeds up to 50Mbpsin several exchanges. XTT provides services to a total of six exchanges in the remote area of the Texas Panhandle. We obtained our state certification and Eligible Telecommunications Carrier status in 1997 with the goal to provide improved communication services to the communities adjacent to our sister cooperative – XIT Rural Telephone Cooperative, Inc. Service was expanded by XTT to include the communities of Dalhart, Stratford, Hartley, Channing, Boys Ranch and Vega Texas. Customers from these exchanges were provided low quality voice service from the incumbent local exchange carrier and, at that time, very little Internet access. Customers in these areas were continually requesting that XTT provide service to them. Today in many of these exchanges XTT serves greater than 70% of the customers.

Rural Telephone Cooperative, Inc. • Communications • Telecommunication & Technology, Ltd.

Realizing at that time that data and high-speed Internet access would be critical to the health of the rural communities in the Panhandle, XTT constructed a fiber-copper-loop plant. Most loops are less than 2,000 feet from existing fiber and no loop is exceeds 4,000 feet from a fiber node. XTT also completed a \$4.2 million upgrade to second generation VDSL equipment. Today's services are provided via a 10-GB-ringed architecture. The existing network can provide reliable 50Mbps service to most residential and business locations. Anchor institutions located within the XTT exchanges have fiber based voice, data, video and Internet access. Even though we have invested a significant amount in these exchanges, more has to be done to provide a high level of broadband service to many customers that are longer distances from existing fiber facilities. The majority of our remaining customers without reliable broadband service are residential customers with a few farmers, ranchers, and dairy farmers.

Proposal

XTT seeks Connect America Fund support to deploy additional fiber and fixed wireless in its network to provide reliable broadband, voice, and other IP based services to approximately 100 customers. XTT has been working diligently to deploy additional fiber in its network with limited funding with the goal of offering higher speeds to customers that are greater distances from existing facilities. The FCC's broadband experiment provides XTT with the ability to obtain needed support to accelerate its construction plans for the Hartley exchange. Today the majority of these 100 customers have less than reliable access to broadband service of less than 1Mbps if at all. The majority of our Hartley customers have access to 3Mbps to 20Mbps of broadband access, video, voice, and other IP based service. XT&T has determined that many of these customers are beyond what may be economical for fiber extensions. In order to provide increased broadband access and reliability to these customers XT&T would propose a mix of fiber extensions and licensed and unlicensed wireless.

Should XTT file for additional support funds once all the rules are available for review, we would request approximately \$555,000 to accomplish our goals in this area. Without the additional Connect America Fund support, XTT may not be able to offer reliable broadband services to these customers for several years.

XTT appreciates the opportunity to provide this non-binding expression of interest. If you have any questions, please give me a call.

Sincerely,

Darrell F. Dennis

General Manager

XIT Telecommunication & Technology, Ltd.

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